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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ZIPPORAH LOMAX,

3:22-cv-01079-SB

PLAINTIFF,

OFFER OF JUDGMENT

v.

CITY OF PORTLAND, a municipal corporation, Portland Police Bureau ("PPB") Police Officers ("P.O.") JOHN DOES 1-5, (the names John Doe being fictitious, as the true names and shield numbers are not presently known), in their individual capacities,

DEFENDANTS.

Pursuant to Fed. R. Civ. P. 68, defendant City of Portland hereby offers to allow judgment in the above-captioned matter to be taken against it by plaintiff Zipporah Lomax for the sum of ten thousand one and 00/100 Dollars (\$10,001), plus costs and reasonable attorneys' fees to be determined by the Court, incurred as of the date of this offer. This Offer of Judgment is made for the purposes specified in Rule 68, Federal Rules of Civil Procedure, and is not to be construed either as an admission that the defendants are liable in this action, or that the plaintiff has suffered damages. Any Judgment entered as a result of this offer must state that the Judgment shall not be construed as an admission of liability nor an admission that plaintiff suffered any damages. Any

Judgment entered as a result of this offer shall act as a preclusive bar to any other legal action by plaintiff against Defendant City of Portland or any of its officers, agents or employees arising out of the subject matter of plaintiff's action.

This Offer of Judgment shall not be filed with the Court unless (a) accepted or (b) in a proceeding to determine costs.

/s/ Caroline Turco

CAROLINE TURCO, OSB #083813

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Of Attorneys for Defendant City of Portland

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing OFFER OF JUDGMENT on:

Jane L Moisan
People's Law Project
818 SW 3rd Ave, #221-3789
Portland, OR 97204
Of Attorneys for Plaintiff

on July 27, 2023, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☒ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☐ by **email** pursuant to LR 5-2(b).
- ☐ by **facsimile transmission**.
- ☒ by **email**.

/s/ Caroline Turco

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